

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

| | | |
|--------------------------|---|-------------------------------------|
| - - - - - | X | |
| | : | <u>SUPERSEDING</u> |
| UNITED STATES OF AMERICA | : | <u>INFORMATION</u> |
| | : | |
| - v. - | : | (S8) 98 16 Cr. 405 (LAK) |
| | : | |
| DAN WEOL CHOI, | : | |
| | : | |
| Defendant. | : | |
| - - - - - | X | |

COUNT ONE

(Conspiracy to Commit Money Laundering)

The United States Attorney charges:

1. From in or about 2012, through in or about 2016, in the Southern District of New York and elsewhere, DAN WEOL CHOI, the defendant, and others known and unknown, intentionally and knowingly did combine, conspire, confederate, and agree together and with each other to violate Title 18, United States Code, Section 1956(a)(1)(A)(i).

2. It was a part and object of the conspiracy that DAN WEOL CHOI, the defendant, and others known and unknown, knowing that the property involved in certain financial transactions represented the proceeds of some form of unlawful activity, willfully and knowingly would and did conduct and attempt to conduct such financial transactions which in fact involved the proceeds of specified unlawful activity, to wit, CHOI harbored individuals for purposes of commercial sex acts, traveled in

interstate and in foreign commerce, and used and caused to be used mails and interstate facilities, in violation of Title 18, United States Code, Section 1952, with the intent to promote the carrying on of such specified unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(A)(i).

(Title 18, United States Code, Section 1956(h).)

COUNT TWO

(Travel Act Conspiracy)

The United States Attorney further charges:

3. Between in or about 2012 and in or about 2016, in the Southern District of New York and elsewhere, DAN WEOL CHOI, the defendant, and others known and unknown, willfully and knowingly did combine, conspire, confederate, and agree together and with each other, to commit an offense against the United States, to wit, a violation of Title 18, United States Code, Section 1952.

4. It was a part and object of the conspiracy that DAN WEOL CHOI, the defendant, and others known and unknown, willfully and knowingly would and did travel in interstate commerce, and use the mail and facilities in interstate and foreign commerce, with the intent to distribute the proceeds of an unlawful activity, and to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of an unlawful activity, to wit, prostitution and money laundering, and thereafter would and did perform an act to

distribute the proceeds of said unlawful activity, and to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of said unlawful activity, in violation of Title 18, United States Code, Sections 1952(a)(1) and (a)(3).

Overt Act

5. In furtherance of the conspiracy and to effect the illegal object thereof, the following overt act was committed in the Southern District of New York and elsewhere:

a. In and about January through April 2016, DAN WEOL CHOI, the defendant, made payments to a co-conspirator for online advertisements for a brothel located in Manhattan.

(Title 18, United States Code, Section 371.)

FORFEITURE ALLEGATION

6. As the result of committing the offense alleged in Count One of this Information, DAN WEOL CHOI, the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(1), any and all property, real and personal, involved in the offense alleged in Count One, and any property traceable to such property, including but not limited to a sum of money in United States currency representing the amount of property involved in said offense.

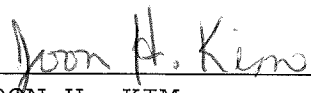
SUBSTITUTE ASSET PROVISION

7. If any of the above-described forfeitable property, as a result of any act or omission of the DAN WEOL CHOI, the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code Section 853(p), and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of the defendant up to the value of the above-described forfeitable property.

(Title 18, United States Code, Section 982;
Title 21, United States Code, Section 853; and
Title 28, United States Code, Section 2461.)



JOON H. KIM
Acting United States Attorney

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

DAN WEOL CHOI,

Defendant.

SUPERSEDING INFORMATION

S6 16 Cr. 405

(18 U.S.C. §§ 371, 1952, & 1956.)

JOON H. KIM

Acting United States Attorney
